

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	No. _____
v.	)	
	)	Violations: Title 18, United
WAYNE GIBBONS	)	States Code, Section
	)	2252A(a)(1)

**COUNT ONE**

The NOVEMBER 2015 GRAND JURY charges:

In or about June 15, 2013, at Solon Mills, in the Northern District of Illinois,  
Western Division, and elsewhere,

WAYNE GIBBONS

defendant herein, using a means and facility of interstate and foreign commerce  
and in and affecting interstate commerce by any means, namely, the Internet,  
knowingly transported and caused to be transported child pornography, as that  
term is defined in Title 18, United States Code, Section 2256(8)(A), namely, an  
electronic file titled “jon001.jpg”;

In violation of Title 18, United States Code, Section 2252A(a)(1).

**COUNT TWO**

The NOVEMBER 2015 GRAND JURY further charges:

On or about June 15, 2013, at Solon Mills, in the Northern District of Illinois, Western Division, and elsewhere,

WAYNE GIBBONS,

defendant herein, using a means and facility of interstate and foreign commerce and in and affecting interstate commerce by any means, namely, the Internet, knowingly transported and caused to be transported child pornography, as that term is defined in Title 18, United States Code, Section 2256(8)(A), namely, an electronic file titled “Baco - 0006.jpg.”;

In violation of Title 18, United States Code, Section 2252A(a)(1).

## FORFEITURE ALLEGATION

The NOVEMBER 2015 GRAND JURY further alleges:

1. The allegations in Counts One through Two of this Indictment are realleged here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

2. As a result of his violations of Title 18, United States Code, Section 2252A(A)(1), as alleged in the foregoing Indictment,

WAYNE GIBBONS,

defendant herein, shall forfeit to the United States any and all right, title and interest defendant has in any matter that contains visual depictions described in Title 18, United States Code, Section 2252A; and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the said violations, including, but not limited to,

a. Toshiba laptop computer with all installed components, serial number Z9217970K; and

b. Dell desktop computer Model W01B bearing bar code CN0GGCR3-70163-9CO-00WY;

c. black in color Staples 4 gigabyte USB “thumb” drive; and

d. orange in color Memorex 2 gigabyte USB “thumb” drive.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
UNITED STATES ATTORNEY